

United States District Court
Eastern District of Michigan
Southern Division

United States of America,

Case No. 20-cr-20436

Plaintiff,

v.

Honorable Robert H. Cleland

Glen Richard Mousseau,

Defendant.

_____ /

First Forfeiture Bill of Particulars

The United States of America, by and through its counsel, submits this First Forfeiture Bill of Particulars, pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure to supplement and clarify the forfeiture allegations contained in the Information and to provide notice of specific property the Government intends to forfeit upon conviction.

1. The allegations set forth in the Information are realleged and incorporated herein by this reference for the purpose of alleging forfeiture pursuant to Federal Rule of Criminal Procedure 32.2(a), 21 U.S.C. § 853, and 31 U.S.C. § 5317.

2. Upon conviction, property subject to forfeiture in this case to the United States pursuant to Federal Rule of Criminal Procedure 32.2(a), 21 U.S.C. § 853, and 31 U.S.C. § 5317 includes, but is not limited to:

- a. SEABOB underwater watercraft;
- b. SEABOB Harness;
- c. SEABOB F5S Charger;
- d. Aqua Lung Dry Suit;
- e. Scuba Pro Dry Suit SC #1842461; and
- f. Gold/white iPhone 6 Model #A1586, IMEI #355410077012161.

This notice does not limit the Government from seeking the forfeiture of additional specific property or limit the Government from seeking the imposition of a forfeiture money judgment.

Respectfully submitted,

Matthew Schneider
United States Attorney

s/ MICHAEL EL-ZEIN
Michael El-Zein Bar No. 79812
Assistant United States Attorney
211 W. Fort Street, Suite 2001
Detroit, Michigan 48226
(313) 226-9770
michael.elzein@usdoj.gov

Dated: October 13, 2020

CERTIFICATION OF SERVICE

I hereby certify that on October 13, 2020, the foregoing document was filed with the Clerk of the Court using the ECF system, which will electronically serve all ECF participants.

s/ MICHAEL EL-ZEIN
Michael El-Zein
Assistant United States Attorney
211 W. Fort Street, Suite 2001
Detroit, Michigan 48226
(313) 226-9770
michael.elzein@usdoj.gov